

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPKO LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No.  
1:23-cv-11195 (SHS) (OTW)

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL**

Under Section IV of this Court’s Individual Practices in Civil Cases, Plaintiff The New York Times Company (“The Times”) respectfully seeks to seal a narrow portion of its opposition to the OpenAI Defendants’ letter motion to compel The Times to add additional custodians (Dkt. 393). Specifically, The Times seeks to seal one exhibit attached to its opposition (Exhibit A). The Times does not seek to seal any portion of its opposition brief, nor any other exhibit to its brief.

The Times explains the basis for this request in the accompanying memorandum of law.

Dated: January 16, 2025

/s/ Ian Crosby

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